

# **EXHIBIT T**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF JOSEPH ROTONDI**

I, Joseph Rotondi, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present and working one block from the World Trade Center Towers when the terrorist attacks of the occurred.

4. I was employed by R. R. Donnelley & Sons Company and was employed as a machinist.

5. I was in New York City working at 75 Park Place, which is approximately one block from the World Trade Center and next to #7 World Trade Center, when the plane(s) hit the towers. I was on the roof of the building when the second plane hit. I received physical injuries in the

escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. Because of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: I had knee injuries requiring continuing treatment, as well as PTSD. I have had multiple treatments and injections for my knee and had surgery in 2016. I am currently receiving Social Security disability due to my knee injuries and PTSD.

7. My PTSD caused by the September 11 terror attacks have dramatically altered my life since that terrible day. I was unable to sleep and avoid spending time away from my home. I cannot drive to the airport and never travel by plane. I avoid travel to Manhattan and avoid all tall buildings. I suffer from severe anxiety that causes panic attacks. I spend a lot of time in my bed and at home. I avoid family functions and old friends as much as possible and will not go to sporting events in Manhattan. I am uncomfortable in crowds. I am unable to do the things I loved doing before 9-11 including sports activities like football, baseball, hockey and bowling.

8. My life has changed drastically since 9-11. I have nightmares about the attacks and I cannot sleep. I have no patience and lose my temper easily. I was only 42 at the time of attacks but I have been unable to work primarily because of PTSD. I survived the attacks, but I feel guilty because I survived. I lost people I care about and the things I saw that day are with me every single day of my life. The catastrophic events on 9-11 have affected me profoundly and I continue to suffer from PTSD including severe and extreme anxiety and depression to this day.

9. I sought medical attention for my injuries. Attached as Exhibit B to this Declaration is a true and correct copy of select medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

10. I suffered, and continue to suffer, severe and traumatic emotional distress because of the above terrorist attacks. I suffered and continue to suffer from traumatic anxiety and depression due to the traumatic events of these terrorist attacks. I also continue to receive treatment for my severe emotional distress.

11. I previously pursued a claim (Claim Number VCF0004006) through the September 11<sup>th</sup> Victim Compensation Fund (VCF) specifically related to my injuries incurred on September 11, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 29th day of December 2019.

  
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Signature of Declarant – Joseph Rotondi

# **Exhibits Filed Under Seal**